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Public Comments on Connect America Fund:=====

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Comment: The Notice for Proposed Rulemaking to add 47 CFR §54.312(c)(3) to the preexisting rule, while admirable, fails to take into account efficiency considerations in my estimation. Discussion point #17 in the NPRM asks for comment on whether requiring certification that carriers seeking funding rank potential fiber deployments and that carriers in fact used such rankings in those deployments. I strongly urge the FCC to require that carriers certify exactly this point.

Although it is true that the cost to the carrier will be greater as resources will be expended on creating a ranking system, the result will be more access to broadband technologies to the greatest number of persons currently living in unserved locations. If this is truly the goal of Connect America, as is stated by the FCC, then making sure that the funds dispersed to carriers are being used efficiently and wisely

seems prudent. Simply allowing a carrier to accept funds and then deploy fiber to currently unserved locations is a broad swath of power that I believe should remain within the purview of the FCC.

Furthermore, discussion point #17 requests comment on additional oversight for any such ranking systems. I believe that the FCC should promulgate a universal set of metrics that carriers receiving this subsidized funding must follow in order to ensure that all funds are being disbursed and used appropriately. Such a requirement, while potentially onerous to both the FCC and carriers at the outset of any such fiber deployment, will help ensure that taxpayer revenues are being spent wisely and are reaching the greatest number of users.

Efficiency is key and I believe that such additional requirements, while regulatory in nature, will create the highest level of efficiency for all potential future users of fiber broadband technologies.

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